

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems)	
And Their Impact On the Terrestrial Radio)	MM Docket No. 99-325
Broadcast Service.)	

COMMENTS OF HARRIS CORPORATION

Harris Corporation (“Harris”) hereby submits these comments in response to the Federal Communications Commission’s recent public notice concerning iBiquity Digital Corporation’s (“iBiquity”) AM IBOC system. *Comments Sought on National Radio Systems Committee DAB Subcommittee’s ‘Evaluation of the iBiquity Digital Corporation IBOC System’*, MM Docket No. 99-325, DA 02-899 (April 19, 2002) (“Public Notice”). Harris encourages the FCC to proceed with its consideration of iBiquity’s In-Band On-Channel (“IBOC”) technology, to endorse the IBOC system and to allow the commencement of digital broadcasting.

Harris is the world’s leading manufacturer of radio and television broadcast transmission equipment, automation solutions and studio systems. Harris has worked closely with iBiquity for many years on both AM and FM IBOC development. Harris provided comments to the FCC in response to its public notice concerning iBiquity’s FM IBOC system and is pleased to be able to provide information to the Commission concerning recent developments in the commercial introduction of IBOC equipment as well as Harris’ views about AM IBOC.

In April 2002, Harris demonstrated commercial IBOC transmission equipment. This long awaited event represents the first step in the commercialization process for IBOC technology. A hugely enthusiastic response met the Harris introduction at the National Association of Broadcasters' convention. Both individual and group owners examined the new equipment and discussed implementation options for various stations. Harris is working with several broadcast groups to plan the introduction of digital broadcasting. Not surprisingly, this enthusiasm about IBOC has extended beyond the United States. Numerous owners from overseas, particularly from countries throughout Latin America, have inquired about acquiring IBOC transmission equipment. Harris is prepared to deliver product to U.S. broadcasters upon FCC authorization to fully support the introduction of digital broadcasting this fall. It is Harris' understanding that fall broadcasts are necessary to support the introduction of commercial receivers at the Consumer Electronics Show in January 2003.

This strong commercial interest in IBOC should confirm for the Commission that prompt regulatory approval of IBOC is necessary. The NRSC has provided a comprehensive industry evaluation of IBOC technology. Broadcasters have indicated their intention to move forward with IBOC implementation upon FCC approval of the technology. It would be unfortunate if delay in the regulatory approval process hindered the commercial launch of this technology, especially in light of the strong interest in IBOC that Harris has witnessed.

Harris believes that the NRSC's recent report on AM provides the Commission with even greater reason to proceed with an endorsement of IBOC and the iBiquity system. The NRSC's AM report verifies iBiquity's long-standing claim that IBOC has

the potential to transform AM broadcasting. The NRSC found that IBOC will offer AM broadcasters the opportunity to offer new formats and new services due to the enhanced sound quality and reliability of the system. Unfortunately, the NRSC did not have sufficient information to reach final conclusions about AM IBOC operation at night. Nevertheless, the NRSC's endorsement of AM IBOC as a daytime-only service while the NRSC continues to examine nighttime AM IBOC provides a sufficient basis for the FCC to endorse AM IBOC.

Harris is aware that broadcasters are waiting for the FCC to reach conclusions about IBOC before fully committing to IBOC implementation. However, the initial interest in and demand for IBOC has exceeded Harris' expectations. The Commission should listen to the broadcast industry's desire to provide this important upgrade by immediately endorsing FM IBOC and endorsing as a daytime service AM IBOC. Prompt Commission action is critical to ensure the successful introduction of digital broadcasts this fall in order to justify the introduction of digital receivers at CES'03.

Respectfully submitted,

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